

Exhibit 8

Indiana Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
Indiana – Meta Proposal

Search Terms: On December 8, 2024, Meta made its most recent counterproposal on to the Indiana Department of Child Services, Department of Health, Department of Education, and Family and Social Services Administration.

| # | I. Search Strings for Youth Focused Agencies |
|---|---|
| | Search Set 1 – Search Strings for Youth Focused Agencies |
| 1 | (“social media” OR “social network” OR “Meta” OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”) |
| | Search Set 2 – Youth Mental Health / Wellbeing Issues [To be combined as one overarching parenthetical with OR between] |
| 2 | wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*) |
| 3 | (“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*) |
| 4 | (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*) |
| 5 | (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*) |
| 6 | (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”) |

MDL 3047 – 2024-12-09 Agency Discovery JLB
Indiana – Meta Proposal

| | |
|----|--|
| 7 | (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) |
| 8 | (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) |
| 9 | (negative w/3 (appearance OR experience OR affect* OR effect*)) |
| 10 | (compar* w/5 (appearance OR social OR other* OR negative)) |
| 11 | (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) |
| 12 | (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)) |
| 13 | (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc**”) |
| 14 | (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) |
| | Search Set 3 – Other Case Issues |
| 15 | (legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”) |
| | II. Search Strings for Non-Youth-Focused Agencies |
| | All search strings referenced above run against below “Youth” gating terms with “AND” connector. |
| | (teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR student* OR pupil*) |

MDL 3047 – 2024-12-09 Agency Discovery JLB
Indiana – Meta Proposal

Meta proposes that the Department of Child Services and the Department of Education run the following search term combinations:

- Social Media Terms **w/150** Mental Health/Wellbeing Terms;
- Social Media Terms **AND** Other Case Issues Terms; and
- Youth Terms **AND w/150** Mental Health/Wellbeing Terms.

Meta proposes that the Department of Health and Family and Social Services Administration run the following search term combinations:

- Social Media Terms **w/150** Mental Health/Wellbeing Terms **AND** Youth Terms;
- Social Media Terms **AND** Other Case Issues Terms **AND** Youth Terms; and
- Youth Terms **AND w/150** Mental Health/Wellbeing Terms.

Meta proposes that the Department of Child Services, the Department of Health, and Family and Social Services Administration run the following search term combination, in addition to the search term combinations above:

- Social Media Terms **AND** (“Youth Advisory Board” or “YAB”)

MDL 3047 – 2024-12-09 Agency Discovery JLB
Indiana – Meta Proposal

Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012, to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Custodians designated with an asterisk (*) have been affirmatively proposed and agreed to by the Indiana AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

| Agency | Custodian | Title |
|--|-------------------|---|
| Department of Health | Eden Bezy* | Assistant Commissioner; Women, Children, and Families Commission |
| Department of Health | Kate Schedel* | Director of Maternal and Child Health Programs |
| Department of Health | Rose Douglass* | Division Director; Maternal and Child Health* |
| Department of Education | Diana Smith* | Director of Digital Learning |
| Department of Education | Michelle Clarke * | Director of the Student, School and Family Engagement |
| Department of Education | Stephen Balko* | Director of School Building Security |
| Family and Social Services Administration | Rebecca Buhner | Deputy Director, Division of Mental Health and Addiction |
| Family and Social Services Administration | Tina Smith* | Addiction Stimulus and Community Catalyst Grants Manager; Division of Mental Health and Addiction* |
| Department of Child Services | David Reed* | Deputy Director of Child Welfare Services |
| Family and Social Services Administration | Bethany Ecklor | School & Community Based Programs Director, Division |

MDL 3047 – 2024-12-09 Agency Discovery JLB
Indiana – Meta Proposal

| Agency | Custodian | Title |
|------------------------------|-------------------|---|
| | | of Mental Health and Addiction |
| Department of Child Services | Harmony Gist* | Deputy Director of Strategic Solutions and Agency Transformation |
| Department of Child Services | Heather Kestian * | former Deputy Director of Strategic Solutions and Agency Transformation |

Indiana's Proposed Edits to Meta's Search Strings
12/4/2024

I. Search Strings for Youth Focused Agencies

| <i>Search Set 1 – Youth Use of Social Media</i> | |
|---|---|
| 1. | ("social media" OR "social network" OR "Meta" OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR "direct message") |
| <i>Search Set 2 – Youth Mental Health / Wellbeing Issues [To be combined as one overarching parenthetical with OR between parentheticals with geographic limiters]</i> | |
| 2. | (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*) |
| 3. | ("pro-ana" OR "BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*) |
| 4. | (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*) |
| 5. | (violen* OR abus* OR assault* OR fight* OR altereation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*) |
| 6. | (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR "social reward" OR "social approval" OR "screen time" OR screentime staytime OR timespent OR "time spent" OR "engagement" OR impression* OR "monthly active users" OR "daily active users" OR "monthly active people" OR "daily active people" OR "weekly active users" OR "mandatory break" OR "limiting tool" OR "habit loop" OR "operant conditioning" OR "impulse control") |

| | |
|-----|--|
| 7. | (eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) |
| 8. | (sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)) |
| 9. | (negative w/3 (appearance OR experience OR affect* OR effect*)) |
| 10. | (compar* w/5 (appearance OR social OR other* OR negative)) |
| 11. | (body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)) |
| 12. | (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)) |
| 13. | (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”) |
| 14. | (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul) |

Search Set 3 – Other Case Issues

| | |
|-----|--|
| 15. | (police* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”) |
|-----|--|

II. Search Strings for Non-Youth-Focused Agencies

All search strings referenced above run against below “Youth” gating terms with “AND” connector.

(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR ~~scholar*~~ OR ~~School*~~ OR student* OR pupil* OR ~~grade*~~)

Indiana’s proposed Search String Combinations (via email 12/4/2024):

For DCS, DOE/SBOE:

- 1) Social Media Terms AND w/10 Mental Health/Wellbeing Terms;
- 2) Social Media Terms AND Other Case Issues Terms

For IDOH and FSSA:

- 1) Social Media Terms AND w/10 Mental Health/Wellbeing Terms AND Youth Terms;
- 2) Social Media Terms AND Other Case Issues Terms AND Youth Terms

For DCS, IDOH, and FSSA:

- 3) Social Media Terms AND (“Youth Advisory Board” or “YAB”)